

Entity: AZEE AIR

POLICY BRIEF & PURPOSE

Our *Employee Code of Conduct* company policy outlines our expectations regarding employees' behavior towards their colleagues, supervisors, the overall organization and any interactions with any person or entity when acting on behalf of the Company. We promote freedom of expression and open communication. But we expect all employees to follow our Code of Conduct ("Code"). Every employee They should avoid offending, participating in serious disputes, and disrupting our workplace or business. Employees are expected to foster a well-organized, respectful, and collaborative environment at all times.

Employees who violate this Code will be subject to disciplinary action up to and including termination of employment. Violations also may result in civil or criminal penalties. An employee who witnesses a violation and fails to report it may be subject to discipline, and a manager may be subject to discipline to the extent that a violation reflects inadequate oversight.

Retaliation against employees who report what they believe in good faith to be a violation of this Code or any law or regulation applicable to the Company, who assist another in making such a report or who cooperate with an investigation of any such violation is strictly prohibited and will result in disciplinary action up to and including termination of employment.

SCOPE

This policy applies to all our employees regardless of employment agreement or rank, as well as independent contractors and persons acting on behalf of the Company.

POLICY ELEMENTS

Company employees are bound by their contract to follow our Employee Code of Conduct while performing their duties. We outline the components of our Code below:

Compliance with the Law

The Company and its employees must obey all applicable laws and regulations that affect the Company's business. Some of the more common laws and regulations are discussed in this Code. Although the Company does not expect its employees to be experts in legal matters, it holds each employee responsible for being familiar with the laws governing his or her areas of responsibility. If you have a question concerning the application of any law or regulation to a contemplated action, it is your responsibility to seek guidance. We expect employees to be ethical and responsible when dealing with our company's finances, products, partnerships, and public image.

Respect in the Workplace

All employees should respect their colleagues. We won't allow any kind of discriminatory behavior, harassment, bullying, or victimization. Treat all fellow employees, customers, business partners, and other stakeholders with dignity and respect at all times.

Any type of harassment, including physical, sexual, verbal or other, is prohibited and can result in disciplinary action up to, and including, termination. Harassment can include actions, language, written words, or objects that create an intimidating or hostile work environment

Equal Opportunity

The Company's policy on equal employment opportunity prohibits discrimination based on race, color, religion, national origin, sex, age, physical or mental disability or veteran or any other status or classification protected by applicable federal, state or local law. This policy applies to all terms and conditions of employment, including recruiting, hiring, transfers, promotions, terminations, compensation, and benefits.

Anti-Discrimination/Anti-Harassment

The Company is committed to maintaining a work environment free from all forms of discrimination and harassment. In keeping with this commitment, the Company will not tolerate discrimination or harassment by anyone, including a supervisor, co-worker, supplier, vendor, consultant, visitor or customer of the Company. Harassment consists of unwelcome conduct, whether verbal, physical or visual, that is based upon a person's protected status, such as race, color, religion, national origin, sex, age or physical or mental disability. All employees are responsible for helping assure that we avoid harassment in the workplace and immediately reporting any harassment experienced or witnessed.

Protection of Company Property

The company requires all employees to protect its assets. All assets should be efficiently used for legitimate purposes and for company business only. All employees should treat our company's property, whether material, immaterial, tangible, or intangible, with respect and care.

Assets include facilities, equipment, computers and information systems, telephones, employee time, confidential and proprietary information, corporate opportunities, and company funds.

Suspected incidents of fraud, theft, negligence, and waste should be reported immediately to your supervisor and Human Resources.

Employees:

Shouldn't misuse company equipment or use it frivolously.

Should respect all kinds of incorporeal property. This includes trademarks, copyright, and other intellectual property (information, reports, etc.). Employees should use them only to complete their job duties.

Employees should protect company facilities and other material property (e.g. company cars) from damage and vandalism, whenever possible.

Company Funds

Employees must be conscientious and scrupulous in their handling of funds and property belonging to the Company, and must always avoid any form of financial impropriety. Employees must not use, or permit the use of, Company funds, property, or resources for anything other than approved Company business or activities.

Suspected incidents of fraud, theft, abuse, negligence or other inappropriate use will be swiftly addressed and are subject to disciplinary action.

Professionalism and Collaboration

All employees, consultants and or any person working for the Company shall conduct themselves at all times in a courteous, professional and ethical manner. This includes in the workplace as well when engaging in any Company business or otherwise representing the Company, including when dealing with external entities or individuals, including customers, distributors, resellers, government officials and competitors.

All employees must show integrity and professionalism in the workplace as well . We expect employees to show responsibility, accountability, and empathy, with respect for others and commitment to the Company.

Employees should be honest, friendly, and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work.

Personal Appearance

All employees must follow our dress code and personal appearance guidelines.

Health and Safety

The company conducts business in accordance with applicable health and safety requirements and strives for continuous improvement in its health and safety policies and procedures.

All employees are expected to perform their work in compliance with applicable health and safety laws, regulations, policies, and procedures and apply safe work practices at all times in all locations.

Employees are required to immediately report workplace injuries, illnesses, or unsafe conditions including "near-misses."

Drug-Free Workplace

Our policy is to provide a working environment free of the problems associated with the use and abuse of controlled substances or alcohol. The distribution, dispensing, possession or use of illegal drugs or other controlled substances, except for approved medical purposes, at any Company office or site where Company employees are engaged in work-related activities is strictly prohibited. In no event should any employee be under the influence of alcohol, illegal drugs or controlled substances (other than controlled substances approved for medical purposes) while present at any such office or site. Alcohol shall not be consumed on Company premises except as authorized during Company-sponsored events.

Absenteeism, Tardiness and Timekeeping

Employees should follow their schedules. We can make exceptions for occasions that prevent employees from following standard working hours or days. But generally, we expect employees to be punctual when coming to and leaving from work.

Each employee must record accurately his or her time on a daily basis in accordance with the Company's established timekeeping policies and procedures. Each employee is expected to read, fully understand, and follow those policies and procedures. In reporting your time electronically, you are certifying that your time is being charged in accordance with those policies and procedures. Improperly shifting cost from one contract to another, improperly charging labor or materials and falsifying timecards are strictly prohibited. If you have any

questions or doubts regarding how to charge time or record costs, it is your responsibility to seek guidance.

Job Duties and Authority

Employees owe a duty of loyalty and fidelity to the Company. Employees are expected to perform their job duties on behalf of the Company faithfully, diligently, and to the best of their abilities, with integrity and respect toward customers and the community.

Supervisors and managers must not abuse their authority. We expect them to delegate duties to their team members taking into account their competencies and workload. Likewise, we expect team members to follow team leaders' instructions and complete their duties with skill and in a timely manner.

Anti-Corruption

The Company expects all employees, consultants or other third parties working for the Company to conduct themselves at all times in a courteous, professional and ethical manner when dealing with external entities or individuals, including customers, distributors, resellers, government officials and competitors. Laws, regulations, and other guidance regarding business practices vary around the globe.

The Company has a zero tolerance for all forms of unethical business practices, including bribery, corruption and kickbacks and will not tolerate obtaining business through any illegal or improper means. As such, employees, consultants or other third parties working for the Company are strictly prohibited from offering or providing anything of value (including lavish entertainment, gifts or hospitality) to any third party with whom we conduct business in order to obtain business, retain business or receive any other form of improper advantage.

Business Courtesies, Gifts and Hospitality

During the course of business discussions with customers it may be acceptable to provide modest and reasonable meals and refreshments. Meals should be provided only in connection with a legitimate business purpose and should be modest by local standards and provided only occasionally. Similarly, it may be acceptable to provide gifts or other business courtesies of nominal value to customers. Any contemplated meal, gift or other business courtesy in excess of US\$100 per person/per event must be approved in advance by the General Counsel.

Likewise, it is critical that the Company makes its own business decisions on the basis of objective criteria and what is best for our stakeholders. As such, employees should not accept meals, entertainment or gifts from suppliers or customers that are of more than \$50 in value.

Dealing with Government Officials

The Company may deal with government employees or officials as customers or regulators. The Company may also be subject to inspections and audits by government regulators. Dealing with government officials is not the same as dealing with non-government individuals. Business courtesies, like paying for a meal, which might be permissible when dealing with private parties may not be permitted with government officials.

The U.S. Foreign Corrupt Practices Act and similar laws that address anti-corruption around the world prohibit improper payments or bribes to foreign government officials for corrupt

purposes. Such purposes could be to gain or retain business, to obtain a business advantage or to influence the actions or decisions of a foreign government official or employee. Be aware that the definition of a foreign government official may include his or her relatives and business associates and employees of state-owned entities. Employees must also use reasonable care to make sure that our business partners, consultants, and agents do not take actions on the Company's behalf that the Company itself would not be permitted to take.

Exports and Sanctions

The U.S. Government has in place export control laws and regulations designed to ensure that transfers of products, services, and technology are accomplished in a manner that is consistent with its national security and foreign policy goals. These laws can apply to transfers of U.S.-origin goods and technology, use and sale of U.S.-origin aircraft, and to actions taken outside of United States. The United States also imposes sanctions that restrict trade and financial transactions with certain countries, entities, and individuals. The Company supports the purpose of these laws and is committed to compliance with the U.S. trade and economic sanctions. Under no circumstances may any of business be conducted contrary to these controls.

The Company expects its employees, officers, and agents, to adhere to the Company's commitment to compliance and it is each employee's responsibility to have a basic understanding of trade and economic sanctions laws; know the requirements of the Company's compliance procedures where applicable to our duties; and seek appropriate guidance in a timely manner. Noncompliance will be met with appropriate disciplinary action, including the possibility of termination. Further, failure to comply with U.S. trade and economic sanctions, when required, can result in criminal sanctions, the loss of U.S. export/import privileges, civil fines, debarment from government contracting, and imprisonment. These penalties can be levied against the Company and against individuals.

Restrictive Trades/Boycotts

A request to participate in any activity that could have the effect of promoting a boycott or restrictive trade practice fostered by a foreign country against customers or suppliers located in a country friendly to the United States or against a U.S. person, firm or corporation may be a violation of law and must be reported promptly to your immediate supervisor. This includes but is not limited to the Arab League boycott of Israel. An employee should not take any action with respect to a potential boycott request without prior written approval from the Company.

Conflict of Interest

A conflict of interest can occur when an employee's personal activities, investments, or associations compromises their judgment or ability to act in the company's best interests. We expect employees to avoid any personal, financial, or other interests that might hinder their capability or willingness to perform their job duties and may lead to a conflict of interest.

It's important for employees to disclose any relationships, associations, or activities that could create actual, potential, or even *perceived* conflict of interest to their manager or the Human Resources Department.

Please refer to the Company's *Conflict of Interest Policy* for further detail.

Disclosure of Potential Conflicts

Employees must promptly disclose to the Company material information regarding any relationship, ownership, or business interest (other than non-controlling investments in publicly-traded corporations), whether direct or indirect, that the employee or a member of his/her immediate family has with any person, or in any business or enterprise, that:
competes with the Company; or
purchases or sells, or seeks to purchase or sell, goods or services to or from the Company.

Protective Steps

Upon disclosure of the information described above, the Company will take appropriate steps to

protect against any actual or potential conflict of interest. Such steps may include:

Requiring the employee to refrain from being involved in any decisions made by the Company regarding its dealings with such person, business or enterprise; or

Requiring the employee to refrain from being involved in any dealings on behalf of the Company with such person, business or enterprise; or

Requiring the employee to dispose of his/her interest in such business or enterprise if he/she wishes to remain in the Company's employ.

Any violation of the conflict of interest that enriches an employee—corruption, theft, embezzlement, or other unlawful behavior—will result in termination and potential prosecution under appropriate law.

Harm to Business or Reputation

Employees must refrain from engaging in conduct that could adversely affect the Company's business or reputation. Such conduct includes, but is not limited to:

publicly criticizing the Company, its management, or its employees.

engaging in criminal conduct or other behavior that could harm the Company's business or reputation.

Confidential Information

Employees are expected to uphold their commitment to information confidentiality. Confidential information (printed, electronic, or otherwise) relating to the Company's past, present, future, and contemplated assets, operations, products or services, industrial designs, inventions, production methods, marketing strategies and objectives, personnel, facilities, equipment, finances, pricing, interest rates, sales, customers, routines, policies, and business procedures must never be disclosed to anyone outside the Company's organization, without the Company's express written authorization.

Proprietary information includes non-public information that might be harmful to the company and its customers and business partners if disclosed.

Outside Employment or Business Activity

During working hours, employees are expected to devote their full time and attention to the business and the affairs of the Company.

If an employee wishes to engage in employment or business activity outside his/her employment with the Company, the employee must first disclose to the Company the nature and extent of the proposed employment or business activity, and obtain the Company's written approval.

Approval will only be withheld if the Company reasonably determines that the employee's proposed outside employment or business activity could conflict or compete with the interests of the Company, or could negatively affect the employee's job performance or attendance.

Doing Business with the U.S. Government

Truth in Negotiations Act (TINA)

The Company must comply fully with TINA in the conduct of its U.S. Government business. The purpose of TINA is to give the Government an effective means of negotiating a fair and reasonable price.

TINA requires disclosure of cost or pricing data and certification that such data are accurate, complete, and current. Employees involved in negotiating Government contracts and subcontracts must ensure that all cost and pricing data, communications and representations of fact are accurate, complete, current and truthful.

Organizational Conflicts of Interest

An "organizational conflict of interest" occurs when, because of the Company's other activities or relationships with other persons, the Company is unable or potentially unable to render impartial assistance or advice to the Government, the Company's objectivity in performing the contract work is or might be otherwise impaired, or the Company has an unfair competitive advantage.

For example, an organizational conflict of interest may result when the nature of work performed by the Company on one contract (such as developing a specification) creates an actual or potential conflict of interest on a future procurement or contract opportunity. It is the responsibility of each employee to recognize and report to their supervisors any activities or relationships that might create an organizational conflict of interest so that the Company can take appropriate actions to avoid any such organizational conflict.

Government Furnished Property

Government-furnished property shall be used, maintained, accounted for and disposed of in accordance with the applicable contract requirements and government regulations.

False Claims and False Statements

Knowingly making a false claim or false statement to the government, directly or indirectly, is a violation of law and can subject both the Company and individual employees to civil and criminal sanctions including fines, suspension, debarment and prison sentences. It is the responsibility of each employee to ensure that all claims and statements submitted to the government are truthful and not misleading. In addition, the highest standard of honorable and ethical conduct shall be observed in all relationships with the Company's competitors. The advancement of the Company's business interests through the dissemination of unverified information or other unfair actions intended to damage competitors is prohibited, as are any other dishonorable activities.

Procurement Integrity

During the conduct of any procurement, the Company must not solicit or accept from any source any proprietary or source selection information regarding that procurement. This prohibition begins with the development, preparation, and issuance of a solicitation and concludes with award of a contract, a contract modification or extension. As used herein, proprietary information includes information contained in a bid or proposal, cost or pricing data, and any information submitted to the Government by a contractor and properly designated as proprietary. Source selection information includes such information as listings of offerors and prices, listings of bidders prior to bid opening, source selection plans, technical evaluations of proposals, competitive range determinations, rankings (except for sealed bidding), source selection board reports and evaluations, source selection advisory board recommendations, and other information determined by the head of the agency or contracting officer to be information that could jeopardize the integrity or successful completion of the procurement if disclosed.

Former Government Employees

Special concerns apply to hiring or retaining a government or former government employee as an employee or consultant of the Company. In addition, there are special constraints regarding any communication concerning possible employment of government employees who are designated as “procurement officials.” Company employees shall not conduct any discussions regarding, or make any offer of, future employment to any government employee without first clearing such action with the Company’s President and legal counsel.

Communication

External Communications on Behalf of the Company

Individual employees are not authorized to represent the company to media and/or legal authorities. This authority belongs to the Owner, CEO, COO, and Corporate Communications. Employees should refer all requests for information or interviews to the Media Relations Team/Corporate Communications department.

Social Media

The Company respects the right of employees to use social media for personal and professional purposes. Employees are responsible for complying with company policies and procedures when communicating on social media. Employees are accountable for any information they publish online.

Employees are required to:

reveal their relationship with the company when commenting online on issues related to the company.

respect the privacy of other employees and refrain from publishing photos of them without their consent.

ensure any information they post related to the company is accurate.

comply with the rules of the social media sites they use.

Employees must not:

“pretext”, or pretend to be someone they are not online.

speaking on behalf of the Company if they are not expressly authorized to do so.
share confidential information about the Company, its clients, stakeholders, or suppliers.
post comments or pictures that could harm the Company's brand, reputation, or commercial interests.

Lobbying Activities

The Company is prohibited from using federal funds to pay persons, such as lobbyists or consultants, to influence or attempt to influence executive or legislative decision-making in connection with the award or modification of any Government contract. No employee may hire such a lobbyist or consultant without the President's prior written authorization.

Record Keeping

All documents, databases, voice messages, mobile device messages, computer documents, files, and photos are records.

The use, expenditure and disposal of Company resources must be documented as required by Company procedures. Documents and other records must be maintained in accordance with the applicable requirements of law, contracts and Company policies and shall not be used for personal gain or benefit. No employee or anyone acting on the Company's behalf shall take any action to circumvent the Company's system of internal controls or provide misleading information in Company documents and records.

Employees are required to:

maintain these records and protect their integrity for as long as required.

maintain official record keeping systems to retain and file records required for business, legal, financial, research, or archival purposes.

dispose of your records according to the company's records retention and disposition schedule.

Employees should never destroy documents in response to, or in anticipation of, an investigation or audit.

Combating Trafficking in Persons

The federal Government has adopted a zero tolerance policy regarding its contractors and their employees who engage in or support severe forms of trafficking in persons, procurement of any sex act on account of which anything of value is given or received by any person or use of forced labor. No Company employee shall violate this policy. Please refer to the Company's Anti-Slavery and Human Trafficking Policy for additional details.

Privacy

The Company complies with the requirements of the country's and international privacy laws. The Company and its employees are not to disclose any private, personal information of:

Employees

Customers

Suppliers

Competitors

Third parties

Employees are expected to store all personal information securely, mark it as confidential, and store it only for as long as it is needed for the purpose for which it was collected.

When providing personal information, employees should limit access to only those with a clear business need for the information.

Employees are required to report any breaches of privacy, including the loss, theft of, or unauthorized access to personal information, to their manager.

Benefits

We expect employees to not abuse their employment benefits. This can refer to time off, insurance, facilities, subscriptions, or any other benefit our company offers.

All employees should read and follow our Company policies. If they have any questions, they should ask their managers or the Human Resources department.

Reporting/Speaking Up

The company encourages all employees to ask questions and raise issues without fear of retaliation and is committed to treating reports seriously and investigating them thoroughly.

Employees must report suspected unethical, illegal, or suspicious behavior immediately. The company does not tolerate retaliation against anyone who makes a report in good faith of suspected misconduct, or otherwise assists with an investigation or audit.

The Company reserves the right to use any lawful method of investigation that it deems necessary to determine whether any person has engaged in conduct that in its view interferes with or adversely affects its business. Every employee is expected to cooperate fully with any investigation of any violation of law, the Company's policies and procedures or this Code.

To report a concern, talk to your manager and contact Human Resources.

No Retaliation

Employees who report a concern in good faith cannot be subjected to any adverse employment action including:

Unfair dismissal, demotion or suspension

Unfair denial of a promotion, transfer, or other employment benefit

Bullying and harassment, either in person or online

Exclusionary behavior

Any other behavior that singles out the person unfairly

WAIVER OF THIS CODE

If any employee believes that a waiver of this Code is necessary or appropriate, including, but not limited, to any potential or actual conflict of interest, a request for a waiver and the reasons for the request must be submitted to the Compliance Officer for a decision by the President. Any waiver of this Code for officers and directors may be made only by the Board of Directors.

DISCIPLINARY ACTIONS

Our company may take disciplinary action against employees who repeatedly or intentionally fail to follow our Code of Conduct. Disciplinary actions will vary depending on the violation.

Possible consequences include:

Demotion

Reprimand

Suspension or termination for more serious offenses

Detraction of benefits for a definite or indefinite time

We may take legal action in cases of corruption, theft, embezzlement, or other unlawful behavior.

CODE OF CONDUCT ACKNOWLEDGMENT

By certifying to the Company Code of Conduct, you acknowledge that:

You have read the entire Code of Conduct and understand your responsibilities related to it.

You have had the opportunity to ask questions to clarify any unclear aspects of the code.

You agree to abide by its principles.

You agree to report to the company any violations of the code.

You agree to cooperate in any investigations of violations of the code.

By signing this policy, I acknowledge understanding of the above policy and acceptance of the policy guidelines and constrains.